

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JOSEPH WARREN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 13 CV 4928
	)	
JOHN CICHY, TERRANCE O'BRIEN	)	
and VILLAGE OF SCHAUMBURG,	)	
	)	
Defendants.	)	

**NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. Sections 1441 and 1446, the Defendant Village of Schaumburg, by its attorneys The Sotos Law Firm, P.C., hereby removes the above captioned action from the Circuit Court of Cook County, Illinois, to the United States District Court for the Northern District of Illinois, Eastern Division. In support thereof, Defendant states as follows:

1. On June 28, 2013, the above entitled action was commenced in the Circuit Court of Cook County, Illinois, as Case No. 2013 L 7458, and is pending in that Court.
2. The removing party is a defendant in that action. A copy of the Complaint, which comprises all of the pleadings known by the Defendant Village of Schaumburg to date, is attached to this Notice of Removal as Exhibit A.
3. In this action, Plaintiff purports to present three federal claims pursuant to 42 U.S.C. Section 1983 against the individual Defendants John Cichy and Terrance O'Brien: false arrest, Fourteen Amendment due process, and civil conspiracy. In addition, Plaintiff has brought a state law negligent supervision claim against the Village of Schaumburg, as well as a demand for indemnification.

4. This Court has original jurisdiction over this action pursuant to 28 U.S.C. Section 1331 and 1343 in that three Counts of Plaintiff's Complaint arise under federal law and seeks to redress alleged deprivations, under State law, of rights secured by the Constitution of the United States.

5. Venue is proper in the Northern District of Illinois, Eastern Division, in that Cook County is within the Northern District, Eastern Division.

6. Removal is timely in that this Notice is being filed within 30 days after Defendant received notice of this lawsuit, pursuant to 28 U.S.C. Section 1446(b).

7. All Defendants join in this Notice of Removal.

8. Written notice of this Notice of Removal is being promptly sent to Plaintiff's counsel and to the Clerk of the Circuit Court of Cook County, Illinois by facsimile and first class mail on Thursday, July 11, 2013.

WHEREFORE, Defendant Village of Schaumburg, hereby removes this action to the United States District Court for the Northern District of Illinois, Eastern Division.

RESPECTFULLY SUBMITTED,

Dated: July 10, 2013

/s/John J. Timbo  
JOHN J. TIMBO, Attorney No. 6238251  
*One of the Attorneys for Village of Schaumburg*

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**CERTIFICATE OF SERVICE**

The undersigned certifies that service of the foregoing NOTICE OF REMOVAL was made by facsimile and by mailing a true and correct copy thereof to the following individuals on July 11, 2013:

**Counsel for Plaintiff:**

Jeffrey S. Deutschman  
Bradley A. Skafish  
Deutschman & Associates, P.C.  
77 West Washington Street, Suite 1525  
Chicago, IL 60602

/s/John J. Timbo  
JOHN J. TIMBO, Attorney No. 6238251  
*One of the Attorneys for Village of Schaumburg*